

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION

IN RE: § CASE NO. 13-10285
CHARLES E. ROHER §
DEBTOR(S) § CHAPTER 13

**AMENDED MOTION FOR APPROVAL OF INCLUSION OF
ADDITIONAL PROVISIONS TO DEBTOR'S PLAN**

THIS MOTION SEEKS AN ORDER THAT MY ADVERSELY AFFECT YOU. IF YOU OPPOSE THIS MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE WITHIN TWENTY-ONE DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING, UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, CHARLES E. ROHER, Debtor, in the above-entitled and numbered case, who files this Motion for Approval of Inclusion of Additional Provisions and request the court enter an Order approving the inclusion of additional provisions and as grounds thereof shows:

I.. **ADDITIONAL PROVISIONS REQUESTED**

1. On July 27, 2013, (the "Petition Date"), Debtor filed his Voluntary Petition for Relief under Chapter 13 of the Bankruptcy Code.
2. CHARLES E. ROHER, ("Debtor"), filed a Uniform Plan and Motion for Valuation of Collateral on July 27, 2013.
3. Debtor has filed an amended plan on January 3, 2014 and is requesting the inclusion of additional provisions. Pursuant to the United States Bankruptcy Code, the deadline to file a claim against the Debtor has lapsed. It is necessary to include in the amended plan the additional provision barring certain creditors from filing any further claims against the Debtors. Specifically,

Debtors are amending the plan and including the addition of the following provision:

16. Additional Provisions.

Barred Creditors

The following unsecured creditors who have not filed a claim will be barred: Bank of America, GECB and Onemain.

4. In accordance with the rules of the United States Bankruptcy Court, for the Southern District of Texas, Brownsville Division, Debtor requests that the Court approve the inclusion of the additional provisions, cited herein, to the Debtor's amended plan.

II. PRAYER

For the reasons stated above, the Debtor prays that the Court approve the inclusion of additional provisions to the Debtor' amended plan, enter an Order Approving the Inclusion of Additional Provisions, and for such further relief, at law and in equity, to which Debtors may show themselves justly entitled.

Date: _____

Respectfully submitted,

/s/ Christopher Lee Phillippe
Christopher Lee Phillippe
248 Billy Mitchell Blvd.
Brownsville, TX 78521
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(956) 982-1921 - fax
Federal ID No.: XXXX
State Bar No.: **15915400**

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Motion for Approval of Inclusion of Additional Provisions was served on the date it was filed electronically. Service was accomplished by the method and to the following as indicated:

CHAPTER 13 TRUSTEE:

Cindy Boudloche
1508 American Bank Plaza
Corpus Christi, Texas 78475

U.S. TRUSTEE:

606 N. Carancahua, Ste. 1107
Corpus Christi, TX 78476

DEBTOR:

Charles E. Rohrer
324 San Diego Ave.
Brownsville, TX 78526

Bank Of America
Po Box 982235
El Paso, TX 79998

Citi
PO Box 6241
Sioux Falls, SD 57117

Onemain Fi
Po Box 499
Hanover, MD 21076

GECRB/Lowes
Attention: Bankruptcy Department
PO Box 103104
Roswell, GA 30076

/s/ Christoher L. Phillippe
Christopher L. Phillippe